

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA * *

v. *

* CRIMINAL NO.: RDB-14-0186

RICHARD BYRD *

* * * * * * * * * * * * * * * * *

MOTION TO MODIFY DEFENDANT'S DETENTION STATUS

Now comes the Defendant, **Richard Byrd**, by his attorney, David R. Solomon, Esquire, and respectfully requests that his present detention status be modified and for reasons therefore, states:

- 1) That on or about July 27, 2016, a hearing on counsel was conducted before the Honorable Richard D. Bennett of the United States District Court for the District of Maryland
- 2) That at the hearing, the Defendant ultimately withdrew a request to represent himself. However, the Defendant stated that he needed access to the law library at Central Treatment Facility in Washington, D.C. inasmuch as he is on lockdown status.
- 3) That Judge Bennett indicated he would agree to two (2) hour access on a daily basis and further requested that undersigned counsel submit an Order to that effect.
- 4) That on August 3, 2016, undersigned counsel filed an order for Judge Bennett granting the request by the Defendant to have access up to two (2) hours, per day, at the Central Treatment Facility.
- 5) That on August 4, 2016, the Clerk's Office contacted undersigned counsel's office to advise that the Order had to be accompanied by a Motion.
- 6) That undersigned counsel is hereby filing this Motion requesting that the Defendant be given access to the law library at the Central Treatment Facility for up to two (2) hours, per day.

WHEREFORE, the Defendant respectfully requests:

- a) That the attached Order be GRANTED; and,
- b) For such other and further relief as the cause of justice may require.

Respectfully submitted,

DAVID R. SOLOMON, ESQ.
201 N. Charles St., Suite 1717
Baltimore, Maryland 21201
Phone No.: 410-244-8822
Fax No. : 410-625-1028

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 4th day of August, 2016, a copy of the foregoing was electronically forwarded to: James G. Warwick, Esquire, Kenneth S. Clark, Esquire, Assistant United States Attorneys, U.S. Department of Justice, 36 South Charles Street, Fourth Floor, Baltimore, Maryland 21201.

DAVID R. SOLOMON, ESQ.

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* CRIMINAL NO.: RDB-14-0186

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* * * * *

ORDER

It is hereby ORDERED this _____ day of August, 2016, that the Defendant, Richard Byrd, is hereby allowed up to two (2) hours, per day, while being housed at Central Treatment Facility in Washington, D.C. to access and use the law library.

JUDGE RICHARD D. BENNETT